

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

JESSICA MURCH, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

QUEST HEALTH SOLUTIONS, LLC

and

HAPPY QUOTE LLC

Defendants.

Case No. 24-5478

**JURY TRIAL DEMANDED**

**SECOND MOTION FOR EXTENSION OF TIME**

The Plaintiff, Jessica Murch, respectfully requests that she receive a second extension of time to April 9, 2025 in order to oppose Defendant's Motion to Dismiss (ECF No. 19).

This is the Plaintiff's second motion, which is being sought due to several unforeseen circumstances evident today, on an urgent basis, and not for the purposes of delay. Counsel for Plaintiff has two unforeseen briefings in another Court, which this morning, the Court ordered responses to be filed today. Additionally, Westlaw is currently experiencing a nationwide outage without an estimated resolution time. Finally, counsel for Plaintiff will be undergoing a medical procedure at the latter part of next week. Given these additional circumstances, it will be difficult for the Plaintiff to complete the response in the time allotted, as the response is currently due tomorrow.

Counsel for Plaintiff sought the consent of Defendant Quest Health Solutions, LLC, but was unable to receive a timely response. Furthermore, Plaintiff agrees that Defendant Quest Health may have a corresponding deadline to file a motion to file its reply brief in support of its Motion to Dismiss on or before April 23, 2025.

RESPECTFULLY SUBMITTED AND DATED this March 25, 2025.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
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*Attorney for Plaintiff and the Proposed Class*

**CERTIFICATE OF SERVICE**

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this March 25, 2025.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.